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Proposed Attorneys for Nicholas Delzotti,

Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: LOTUS EXIM INTERNATIONAL, INC. Debtor.	Case No. 18-15957 (VFP) Chapter 7
In re: LOTUS MARBLE & GRANITE, INC., Debtor.	Case No. 18-15961 (VFP) Chapter 7
In re: PERFECT MARBLE & GRANITE, INC., Debtor.	Case No. 18-15965 (JKS) Chapter 7
In re: ELEGANT MARBLE & GRANITE, INC., Debtor.	Case No. 18-15966 (SLM) Chapter 7
In re: LOTUS NATURAL STONE, LLC, Debtor.	Case No. 18-15967 (JKS) Chapter 7
In re: MAJESTIC GRANITE & MARBLE, INC., Debtor.	Case No. 18-15969 (VFP) Chapter 7 HEARING DATE AND TIME: May 1, 2018, at 10:00 a.m. NO ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION FOR ENTRY OF AN ORDER DIRECTING THE JOINT
ADMINISTRATION OF THE DEBTORS' CHAPTER 7 CASES PURSUANT TO FED. R.
BANKR. P. 1015(b) AND GRANTING OTHER RELATED RELIEF**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that, on the 1st day of May, 2018, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, proposed counsel for Nicholas Delzotti, Chapter 7 Trustee (the "Trustee"), shall move before the assigned United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for entry of an Order directing the joint administration of the above-captioned Debtors' Chapter 7 cases pursuant to Fed. R. Bankr. P. 1015(b) (the "Motion").

PLEASE TAKE FURTHER NOTICE a proposed Order granting the relief requested in the Motion is also being submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be filed with the office of the Clerk of the Bankruptcy Court and served upon the undersigned within seven (7) days in advance of the aforesaid hearing, responding papers stating with particularity the basis of your opposition to the Motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned does not request oral argument on the return date of the Motion unless an objection is filed and not resolved.

COLE SCHOTZ P.C.

*Proposed Attorneys for Nicholas Delzotti,
Chapter 7 Trustee*

By: /s/ Stuart Komrower
Stuart Komrower, Esq.

DATED: April 6, 2018